

# **Exhibit 3**



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September 10, 2014

**VIA E-MAIL**

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Steven P. Blonder  
Much Shelist  
191 North Wacker Drive  
Suite 1800  
Chicago, IL 60606-1615

**Re: Hale v. State Farm**

Dear Gentlemen:

This letter further addresses Mr. Blonder's letter of August 26, 2014, and also follows up on our meet and confer meeting on September 4, 2014 in order to provide certain information requested by Plaintiffs.

State Farm's Rule 26(a)(1) Initial Disclosures identify individuals who may have information relevant to the claims or defenses in this lawsuit. Of those individuals, State Farm has identified John Ashenfelter (Associate General Counsel), Kim Brunner (former Senior Vice President and General Counsel), Jeff Jackson (Senior Vice President and General Counsel), Alan Maness (Associate General Counsel), Steve McManus (Vice President – Counsel), Ed Rust (Chairman and CEO), and Bruce Tompkins (Associate General Counsel) as persons who may have received or created relevant electronic or paper material.

State Farm's information retention program has been administered by different individuals at different times. During the 2003-2005 time period, Dan Cochran was generally responsible for overseeing the administration of State Farm's information retention program. Jim Havens presently has that role.

During the September 4 meet and confer meeting, Plaintiffs inquired whether State Farm will withdraw its confidentiality designations as to HALEM00137, HALEM00138 and HALEM00140-141. All three documents disclose the substance of associational communications that are potentially protected by the First Amendment. Notwithstanding, State Farm withdraws its confidentiality designations as to HALEM00138 and HALEM00140-141, without waiver of or prejudice to any First Amendment privileges as to other information relating to the same or similar subject or content. State Farm does not withdraw its confidentiality designation as to HALEM00137.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Nick Kahlon', is written over a horizontal line.

Nick Kahlon

NK:pdd

cc: Joseph A. Cancila (by e-mail)  
Patrick Croke (by e-mail)  
Russell K. Scott (by e-mail)  
Patrick Cloud (by e-mail)